

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
EASTERN (WATERLOO) DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 21-CR-2074
	)	
vs.	)	
	)	
BILLIE JOE WICKHAM,	)	
also known as "Bill," and CHARLIE	)	
LYNCH, also known as "Charles Lynch,"	)	
	)	
Defendants.	)	

**LOCAL RULE 7 STATEMENT**

Pursuant to Local Criminal Rule 7, notice is hereby given that the Superseding Indictment filed in this matter varies from the original Indictment as follows:

1. Due to his death on November 15, 2021, Steven Charles Demaray is removed as a defendant. Charlie Lynch is added as a defendant.
2. Counts 3-8 are new.
3. Additional factual allegations are set forth in Paragraph 3, 5, and 6.
4. The time period at issue in Paragraph 4 is expanded.

Respectfully submitted,

TIMOTHY T. DUAX  
Acting United States Attorney

By: /s/ Timothy L. Vavricek

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